IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE GREENEVILLE DIVISION

B.P., H.A., and S.H., individually, and on Behalf of all others similarly situated,)
Plaintiffs,))
VERSUS) No. 2:23-cv-00071-TRM-CRW
CITY OF JOHNSON CITY, TENNESSEE, et al)
Defendants.)

NOTICE OF SEALED FILING

COMES NOW the Defendant, Kevin Peters and Toma Sparks, in their individual capacity, by and through counsel, and pursuant to LR 37.2 and 26.2(b), and ECF Rule 12.2, and gives notice of the filing of the attached excerpts of the deposition of B.P. These excerpts are filed under seal due to the content of same, which relate to the circumstances of her alleged sexual assault. They cannot be redacted in a fashion where they can be filed publicly.

Respectfully submitted,

MOORE, RADER AND YORK, P. C.

s/DANIEL H. RADER IV, BPR #025998 DANIEL H. RADER IV / BPR #025998

DANIEL II. KADEK IV / DI F

P. O. Box 3347

Cookeville, TN 38502

Phone: (931) 526-3311

danny@moorerader.com

Attorneys for Kevin Peters, individually

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically with the Court. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

Ashley Walter HMC Civil Rights Law, PLLC 7000 Executive Center Dr. Brentwood, TN 37027 615-724-1996

Email: ashley@hmccivilrights.com

Heather Moore Collins HMC Civil Rights Law, PLLC 7000 Executive Center Dr. Suite 320 Brentwood, TN 37027

615-724-1996

Email: heather@hmccivilrights.com

Ms. Elizabeth A. Kramer Mr. Kevin M. Osborne Erickson, Kramer Osborne LLP 44 Tehama Street San Francisco CA 94105 (415-635-0631)

Email: <u>elizabeth@eko.law</u> Email: <u>kevin@eko.law</u>

Emily C. Taylor Watson Roach Batson & Lauderback P. O. Box 131 Knoxville, TN 37901-0131 865-637-1700

Email: etaylor@watsonroach.com
Attorney for the City of Johnson City,
Tennessee, and Karl Turner, in his
Individual Capacity

Caroline Drinnon HMC Civil Rights Law, PLLC 7000 Executive Center Dr. Brentwood, TN 37027 615-724-1996

Email: caroline@hmccivilrights.com

Vanessa Baehr-Jones Advocates for Survivors of Abuse 4200 Park Blvd., No. 413 Oakland, CA 94602

Email: vanessa@advocatesforsurvivors.

com

Pro Hac Vice Attorney for Plaintiff

Mr. Keith H. Grant
Mr. Philip Aaron Wells
Ms. Laura Beth Rufolo
Robinson, Smith & Wells
633 Chestnut Street
Suite 700 Republic Centre
Chattanooga, TN 37450
Email: kgrant@rswlaw.com
Email: awells@rswlaw.com
Email: lrufolo@rswlaw.com

K. Erickson Herrin
Herrin McPeak & Associates
515 E. Unaka Avenue
P. O. Box 629
Johnson City, TN 37605-0629
(423-929-7113)
Attorney for the City of Johnson City,
Tennessee, Karl Turner, in his
individual and official capacities,
Toma Sparks, in his official
capacity, and Kevin Peters, in his
official capacity

Thomas J. Garland, Jr. Milligan & Coleman, PLLP 230 W Depot St. Greeneville, TN 37743

Email: tgarland@milligancoleman.com
Attorney for the City of Johnson City,
Tennessee, and Karl Turner, in his
Individual capacity

Vanessa Baehr-Jones Advocates for Survivors of Abuse PC 4200 Park Boulevard No. 413 Oakland, CA 94602 510-500-9634

Email: vanessa@advocatesforsurvivors.com

This the 17th day of July, 2024.

Ms. Kristin E. Berexa Mr. Benjamin C. Allen Farrar Bates Berexa 12 Cadillac Drive, Suite 480 Brentwood, TN 37027 615-254-3060 Email: kberexa@fbb.law

ballen@fbb.law Attorneys for Toma Sparks

MOORE, RADER AND YORK, P. C.

s/DANIEL H. RADER IV, BPR 025998 DANIEL H. RADER IV / BPR #025998 P. O. Box 3347 Cookeville, TN 38502 (931-526-3311) danny@moorerader.com